

**Utilities and Transportation Commission**  
**Standard Inspection Report for Intrastate Gas Transmission Pipelines**  
**Form D - Records Review and Field Inspection**

S – Satisfactory    U – Unsatisfactory    N/A – Not Applicable    N/C – Not Checked  
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Chief Engineer within 30 days from completion of the inspection.

Inspection Report			
<b>Inspection ID/Docket number</b>	5819		
<b>Inspector Name &amp; Submit Date</b>	Dave Cullom, 7/16/14		
<b>Chief Eng Name &amp; Review Date</b>	Joe Subsits, 7/24/2014		
Operator Information			
<b>Name of Operator:</b>	Northwest Natural Gas	<b>OP ID #:</b>	13840
<b>Name of Unit(s):</b>	Camas Transmission Line		
<b>Records Location:</b>	Portland Oregon, NWN HQ		
<b>Date(s) of Last (unit) Inspection:</b>	N/A	<b>Inspection Date(s):</b>	June 17-19, 2014

**Inspection Summary:**

This standard inspection consisted of a records review and had a field inspection component. In the field we reviewed, CP PSP readings, checked for casing isolation, checked the odorizer and performed a sniff test, checked the bridge crossing supports, operated mainline valves, and conducted an odorant sniff test at the end of the system. We checked pressure control records for over pressure protection.

The Camas Transmission line was built in 1956 of 8.625 .188 WT Kaiser Grade B API5L pipe. It is assumed that it is low frequency ERW pipe. The system was pressure tested and designed under ASME B31.8. The system is 3.4 miles at it operates at or less than 26% SMYS.

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There was one probable violation.

There are two concrete supports at either side of the Lacamas Lake Bridge that support the P04 - Camas Transmission Line. The annual bridge-line inspection form has items for both atmospheric corrosion and the pipe coating condition. The NWN procedure referenced in SPW 480 3.2.2 indicates, that during the atmospheric inspection, particular attention shall be given to pipe supports. The bridge-line inspection form did not indicate that the line pipe under the supports is being evaluated for corrosion.

<b>HQ Address:</b> 220 NW Second Avenue Portland, OR 97209		<b>System/Unit Name &amp; Address:</b> Camas Transmission Line – P04	
<b>Co. Official:</b> Grant M. Yoshihara	<b>Phone No.:</b> 503-226-4211 ext 2374	<b>Phone No.:</b>	
<b>Phone No.:</b> 503-226-4211 ext 2374	<b>Fax No.:</b>	<b>Fax No.:</b>	
<b>Fax No.:</b>		<b>Emergency Phone No.:</b> Gas Control	
<b>Emergency Phone No.:</b> 503-226-4211 Ext 4613		<b>Emergency Phone No.:</b> 503-226-4211 Ext 4613	
<b>Persons Interviewed</b>	<b>Title</b>	<b>Phone No.</b>	
Samantha Burt	Compliance Specialist	503-226-4211	
Kerry Champine, PE	Manager Code Compliance	503-226-4211	
Chris Wiles	Integrity Management Specialist	503-226-4211	
Andrea Scott	Compliance Specialist		

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Cory Beck	Manager Consumer Information and Internet Services	503-220-2576
Dakota Duncan		503-226-4211
Ryan Truair	Integrity Management Supervisor	503-226-4211
Margaret Locke	Code Compliance/ Compliance Engineer	503-226-4211

<b>UTC staff conducted abbreviated procedures inspection on 192 O&amp;M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.</b>			
(check one below and enter appropriate date)			
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	<b>Date:</b>	
<input type="checkbox"/>	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	<b>Date:</b>	In 2012 by SZ

<b>GAS SYSTEM OPERATIONS</b>			
<b>Gas Supplier</b>	Williams		
Number of reportable safety related conditions last year	0	Number of deferred leaks in system	0
Number of <u>non-reportable</u> safety related conditions last year	0	Number of third party hits last year	0
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	3.4 Miles		
<b>Operating Pressure(s):</b>		<b>MAOP (Within last year)</b>	<b>Actual Operating Pressure (At time of Inspection)</b>
Feeder:	335 psig	400 MAOP	340 @ Williams Meter 720 upstream
Town:			
Other:			
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 4.	No		

<b>Pipe Specifications:</b>			
Year Installed (Range)	1956	Pipe Diameters (Range)	8 inch
Material Type	Steel – Grade B – 35ksi Unknown if LF ERW .188 WT  The P04 Camas replacement segments were completed with X42, 0.219 w. t. pipe. The replacement sections are classified as “HP” distribution by the operator.	Line Pipe Specification Used	API5L
Mileage	3.4	SMYS %	26%
Supply Company	Unknown	Class Locations	Class 3

<b>Integrity Management Field Validation</b>
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**Important:** Per PHMSA, IMP Field Verification Form 16 (Rev 6/18/2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at <http://primis.phmsa.dot.gov/gasimp/home.gim>    **Date Uploaded: Will after Chief Reviews**

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	NA	NC
<b>Subparts A - C</b>	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.	X			

PART 192 Implement Applicable Control Room Management Procedures		S	U	NA	NC
.605(b)(12)	Implementing the applicable control room management procedures required by 192.631. (Amdt. 192- 112, 74 FR 63310, December 3, 2009, eff. 2/1/2010).  *****Notes - These were included in the April 2, 2014 O&M review sent to Marina*****	X			

REPORTING RECORDS			S	U	N/A	N/C
<b>1.</b>	49 U.S.C. 60132, Subsection (b)  ADB-08-07	<b>Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002</b>  Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to <a href="http://www.npms.phmsa.dot.gov/submission/">http://www.npms.phmsa.dot.gov/submission/</a> to review existing data on record. Also report no modifications if none have occurred since the last complete submission. Include operator contact information with <u>all</u> updates. *****Notes - They sent Feb 19 <sup>th</sup> , 2014 and have a response*****	X			
<b>2.</b>	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?	X			
<b>3.</b>	191.5	Immediate Notice of certain incidents to NRC (800) 424-8802, or electronically at <a href="http://www.nrc.uscg.mil/nrchp.html">http://www.nrc.uscg.mil/nrchp.html</a> , and additional report if significant new information becomes available. *****Notes – None for the last three years*****			X	
<b>4.</b>	191.7	Reports (except SRCR and offshore pipeline condition reports) submitted electronically to PHMSA at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> unless an alternative reporting method is authorized IAW with paragraph (d) of this section.	X			
<b>5.</b>	191.15(a)	Do records indicate reportable <u>incidents</u> were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe? *****Notes – None for the last three years*****			X	
<b>6.</b>	191.15(c)	Do records indicate accurate supplemental incident reports were filed and within the required timeframe? *****Notes – None for the last three years*****			X	
<b>7.</b>	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. (NOTE: June 15, 2013 for the year 2012). *****Notes – Was submitted March 14 <sup>th</sup> *****	X			
<b>8.</b>	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a>	X			
<b>9.</b>	191.23	Have complete and accurate <u>Annual Reports</u> been submitted?	X			

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REPORTING RECORDS			S	U	N/A	N/C
10.	191.25  49 U.S.C. 60139, Subsection (b)(2)	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery. <b>Note:</b> Operators of gas transmission pipelines that if the pipeline pressure exceeds maximum allowable operating pressure (MAOP) plus the build-up, owner/operator must report the exceedance to PHMSA <b>on or before the fifth day</b> following the date on which the exceedance occurs.  The report should be titled “Gas Transmission MAOP Exceedance” and provide the following information: <ul style="list-style-type: none"> <li>• The name and principal address of the operator, date of the report, name, job title, and business telephone number of the person submitting the report.</li> <li>• The name, job title, and business telephone number of the person who determined the condition exists.</li> <li>• The date the condition was discovered and the date the condition was first determined to exist.</li> <li>• The location of the condition, with reference to the town/city/county and state or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, and the name of the commodity transported or stored.</li> </ul> The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action.			X	
11.	191.27(a), (b)	Do records indicate reports were submitted within 60 days of completing inspections of underwater pipelines?			X	
12.	192.727(g)	Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway?			X	
13.	480-93-200(1)	Telephonic Reports to UTC <b>Pipeline Safety Incident Notification 1-888-321-9144</b> (Within <b>2 hours</b> ) for events which ( <b>regardless of cause</b> );				
14.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization;			X	
15.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; <b>Note:</b> Report all damages regardless if claim was filed with pipeline company or not.			X	
16.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas;			X	
17.	480-93-200(1)(d)	Results in the unintentional ignition of gas;			X	
18.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;			X	
19.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020;			X	
20.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or			X	
21.	480-93-200(2)	Telephonic Reports to UTC <b>Pipeline Safety Incident Notification 1-888-321-9146</b> (Within <b>24 hours</b> ) for;			X	
22.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;			X	
23.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service;			X	
24.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or			X	
25.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP			X	

**Comments:**

\*\*\*\*Notes – #10-25 No SRCS or incidents in the last three years\*\*\*\*

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26.	480-93-200(5)	Written incident reports (within 30 days) including the following;	S	U	N/A	N/C
27.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;			X	
28.	480-93-200(4)(b)	The extent of injuries and damage;			X	
29.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;			X	
30.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;			X	
31.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;			X	
32.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;			X	
33.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;			X	
34.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;			X	
35.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;			X	
36.	480-93-200(4)(j)	Line type;			X	
37.	480-93-200(4)(k)	City and county of incident; and			X	
38.	480-93-200(4)(l)	Any other information deemed necessary by the commission.			X	
39.	480-93-200(5)	Submit a supplemental report if required information becomes available			X	
40.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any <b>incident or hazardous condition</b> due to <b>construction defects or material failure</b>			X	

<b>Comments:</b>  ****Notes – #26-40 No incidents in the last three years****
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41.	480-93-200(7)	<b>Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission's Virtual DIRT system or on-line damage reporting form)				
42.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n)	X			
43.	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted <u>without facility locates</u> first being completed? ****Notes – <b>Damage Prevention Supervisor uploads monthly</b> ****	X			
44.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? <b>Note:</b> Records maintained for two years and made available to the commission upon request. ****Notes – <b>They keep for two years</b> ****	X			
45.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
46.	480-93-200(8)(a)	<ul style="list-style-type: none"> <li>• Notification requirements for excavators under RCW 19.122.050(1) ****Notes – <b>There is a mailing and it is required to go out within 30 days</b>****</li> </ul>	X			
47.	480-93-200(8)(b)	<ul style="list-style-type: none"> <li>• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and</li> </ul>	X			

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48.	480-93-200(8)(c)	<ul style="list-style-type: none"> <li>Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee.</li> </ul>	X			
49.	480-93-200(9)	<b>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</b> <ul style="list-style-type: none"> <li>An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a))</li> <li>A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) <b>***Notes – None***</b></li> </ul>				X
50.	480-93-200(7)	<b>Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission's Virtual DIRT system or on-line damage reporting form)	X			
51.	480-93-200(10)	<b>Annual Reports</b> filed with the commission no later than <b>March 15</b> for the proceeding calendar year. <i>(NOTE: PHMSA extension to June 15, 2013 for the year 2012).</i>	S	U	N/A	N/C
52.	480-93-200(10)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
53.	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. <b>***Notes – No construction defects or material failures***</b>				X
54.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities <b>*****Notes – the public awareness reports. PJ did a 2011 PA audit*****</b>	X			
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required <b>*****Notes – Sent March 14, 2014*****</b>	X			

**Comments:**

CONSTRUCTION RECORDS			S	U	N/A	N/C
57.	192.225	Do records indicate weld procedures are being qualified in accordance with §192.225? <b>*****Notes – There has been pipe replacements, but they were before the last ECDA was performed. They were in 2000. There was a replacement of the bridge crossing pier block supports at Lacamas Lake*****</b>			X	
58.	192.227	Do records indicate adequate qualification of welders?			X	
59.	192.241(a)	Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)?			X	
60.	192.243(b)(2)	Do records indicate the qualification of nondestructive testing personnel?			X	
61.	192.243(c)	Do records indicate that NDT implementation is adequate?			X	
62.	192.243(f)	Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?			X	
63.	192.243(f)	Number of Welds Inspected by NDT			X	
64.	192.243(f)	Number of Welds Rejected			X	
65.	192.243(f)	Disposition of each Weld Rejected			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
66.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables			X	
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992			X	
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main			X	
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services			X	
70.	192.303	Construction Specifications			X	
71.	192.325	Do records indicate pipe is installed with clearances in accordance with §192.325, and (if plastic) installed as to prevent heat damage to the pipe?			X	
72.	192.327	Amount, Location, Cover of each size of pipe installed			X	
73.	192.328	If the pipeline will be operated at the alternative MAOP standard calculated under 192.620 (80% SMYS) does it meet the additional construction requirements for: <ul style="list-style-type: none"> <li>• Quality assurance</li> <li>• Girth welds</li> <li>• Depth of cover</li> <li>• Initial strength testing, and;</li> <li>• Interference currents?</li> </ul>			X	
74.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length <b>****Notes – No replacement in the last three years****</b>			X	
75.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines <b>****Notes – They pressure tested the Lamas Lake replacement section in 2000 – It is not transmission, but “HP distribution”****</b>			X	
76.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule) <b>****Notes – Williams performs the pressure control and relief. NWN provided records****</b>			X	
77.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig <b>****Notes – No moving or lowering as occurred****</b>			X	
78.	192.455	Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? <b>****Notes – This pipeline was installed in 1956****</b>			X	

**Comments:**

\*\*\*\*Notes – #57-78 No construction since 2000 \*\*\*\*

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
79.	192.10	Do records indicate specific point(s) at which operating responsibility transfers to a producing operator, as applicable? <b>****Notes – There is no producing operator or other transfer of responsibility****</b>			X	
80.	192.14	<b>Conversion To Service Performance and Records.</b>				
81.	192.14(a)(2)	Visual inspection of right of way, aboveground, and selected underground segments <b>****Notes – No conversion to service ****</b>			X	
82.	192.14(a)(3)	Correction of unsafe defects and conditions <b>****Notes – No conversion to service ****</b>			X	
83.	192.14(a)(4)	Pipeline testing in accordance with Subpart J <b>****Notes – No conversion to service ****</b>			X	
84.	192.14(b)	Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline) <b>****Notes - No conversion to service ****</b>			X	
85.	192.16	Customer Notification ( <b>Verification – 90 days – and Elements</b> ) <b>****Notes – No customers****</b>			X	
86.	192.603(b)	Procedural Manual Review – Operations and Maintenance ( <b>1 per yr/15 months</b> ) .605(a) <b>Note:</b> Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09	X			

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<b>OPERATIONS and MAINTENANCE RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>87.</b>	192.603(b)	Did personnel respond to indications of abnormal operations as required by procedures? .605(c) (1) ****Notes – <b>No abnormal operations within the last three years</b> ****			X	
<b>88.</b>	192.603(b)	Availability of construction records, maps, operating history to operating personnel .605(b)(3)	X			
<b>89.</b>	192.603(b)	Periodic review of personnel work – effectiveness of normal O&M procedures .605(b)(8) ****Notes – <b>There is a program both contractor and company across all fields of operations</b> ***	X			
<b>90.</b>	192.603(b)	Periodic review of personnel work – effectiveness of abnormal operation procedures .605(c)(4) *****Notes – <b>QA does on site and post inspections. Also has a post-incident review committee.</b> *****	X			
<b>91.</b>	192.603(b)	Do records indicate systematic and routine testing and inspection of pipe-type or bottle-type holders? .605(b)(10) ****Notes – <b>None</b> ****			X	
<b>92.</b>	<b>Damage Prevention Program</b>					
<b>93.</b>	192.603(b)	List of Current Excavators .614 (c)(1) *****Notes – <b>The list is acquired from the contractor licensing board</b> *****	X			
<b>94.</b>	192.603(b)	Notification of Public/Excavators .614 (c)(2) *****Notes – <b>Mailings go every year. There is an E-news letter.</b> *****	X			
<b>95.</b>	192.603(b)	Notifications of planned excavations. (One -Call Records) .614 (c)(3)	X			
<b>96.</b>	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:					
<b>97.</b>	.614(c)(6)	1. Is the inspection done as frequently as necessary during and after the activities to verify the integrity of the pipeline? ****Notes – <b>2003 was the last time they had excavation damage. The DCVG did not find any anomalies. They have pre-construction meetings</b> *****	X			
<b>98.</b>		2. In the case of blasting, does the inspection include leakage surveys? (required) **Notes – <b>No blasting</b> ***			X	
<b>99.</b>	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample.	X			
<b>100.</b>	195.507(b)	Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements? ****Notes – <b>It is a covered task and it gets looked at by QA/QC.</b> *****	X			
<b>101.</b>	PHMSA – State Program Evaluation Questions	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required)	X			
<b>102.</b>		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?	X			
<b>103.</b>		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?	X			
<b>104.</b>		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? ****Notes – <b>They are OQed under NWN’s plan.</b> ****	X			
<b>105.</b>		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	X			
<b>106.</b>		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
<b>107.</b>		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements?	X			
<b>108.</b>	192.709	Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location? 192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f)) *****Notes – <b>2012 was an HCA update and a new class location study. They used method 1.</b> *****	X			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
109.	192.605(a)	Confirmation or revision of MAOP. Final Rule Pub. 10/17/08, eff. 12/22/08. .611 ***Notes – This was designed to class 3. I looked at the hydrotest for 9-25-56 to 9-26-56. The test pressure minimum was 850. I uploaded the original documents into SharePoint. The operator does not have any heat sheets. Original design specs show GR B in several documents*****	X			
110.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) Note: Review operator records of previous accidents and failures including third-party damage and leak response ***Notes – None within the last three years. 2003 was the last time they had excavation damage. The recent DCVG survey did not find any anomalies.****			X	
111.	192.615	Actions required to be taken by a controller during an emergency in accordance with 192.631. (Amdt. 192-112, 74 FR 63310, December 3, 2009, eff. 2/1/2010). .615(a)(11) *****Notes – This in their control room management. There is only RTU no remote control.****	X			
112.	192.603(b)	Location Specific Emergency Plan .615(b)(1) *****Notes – In the emergency plan and Section 300 in the Field Operations manual. The Clark County gas first responders have copies*****	X			
113.	192.603(b)	Emergency Procedure training, verify effectiveness of training .615(b)(2)*****There is a new training center in Sherwood and they OQ with AOCs.*****	X			
114.	192.603(b)	Employee Emergency activity review, determine if procedures were followed. *****Notes – After reportable incidents – there is a IRC incident review committee. .615(b)(3)	X			
115.	192.603(b)	Liaison Program with Public Officials .615(c) *****Notes – A mailing is done with specific information. They have proof of mailing.*****	X			

**Comments:**

192.603(b) f	<b>Public Awareness Program .616</b>		S	U	N/A	N/C
	Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.					
	<b>API RP 1162 Baseline* Recommended Message Deliveries</b>					
	<b>Stakeholder Audience (Natural Gas Transmission Line Operators)</b>		<b>Baseline Message Frequency (starting from effective date of Plan)</b>			
	Residents Along Right-of-Way and Places of Congregation		2 years ***Notes – Done Annually***			
	Emergency Officials		Annual ***Notes – Done Annually***			
	Public Officials		3 years ***Notes – Done Annually***			
	Excavator and Contractors		Annual ***Notes – Done Annually***			
One-Call Centers		As required of One-Call Center				
* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.						

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116.	192.603(b)	The operator’s program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: .616(d) (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with the unintended release from a gas pipeline facility (3) Physical indications of a possible release; (4) Steps to be taken for public safety on the event of a gas pipeline release; and (5) Procedures to report such an event (to the operator).	X			
117.		Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). .616 (e) & (f)	X			
118.						
119.		The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. .616(g)	X			
120.		Do records indicate implementation of a program evaluation process implemented and continuous improvements based on the findings? 192.616(i) (192.616(h); API RP 1162, Section 2.7 Step 11; API RP 1162, Section 8) ****Note – There is an annual meeting 2013 April 30,2014*****	X			
121.	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 <b>Note: Including excavation damage (PHMSA area of emphasis) ****Notes – No failures or accidents*****</b>	X				

<b>Comments:</b>
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122.	192.517	From the review of the results of pressure tests, do the test records validate the pressure test? ****Notes – See documentation in SharePoint for actual pressure test done in ‘56****	X			
123.	.553(b)	Do records indicate the pressure uprating process was implemented per the requirements of 192.553? ****Notes - No uprate*****			X	
124.	192.709	<b>Maximum Allowable Operating Pressure (MAOP)</b>				
125.	.709	<b>Note: If the operator is operating at 80% SMYS with waivers, the inspector needs to review the special conditions of the waiver.</b>				
126.		MAOP cannot exceed the lowest of the following: .619				
127.		Design pressure of the weakest element, .619(a)(1) ****Notes - No alternate MAOP***			X	



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138.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained *****Notes - None*****			X	
139.	480-93-187	Gas Leak records – Content *****Notes - None*****			X	
140.	480-93-188(1)	Gas Leak surveys – Coverage	X			
141.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days)	X			
142.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X			

<b>Business Districts (By 6/02/07)</b>	<b>1/yr (15 months)</b>
<b>High Occupancy Structures</b>	<b>1/yr (15 months)</b>
<b>Pipelines Operating ≥ 250 psig</b>	<b>1/yr (15 months)</b>
<b>Other Mains: CI, WI, copper, unprotected steel</b>	<b>2/yr (7.5 months)</b>

143.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs *****Notes – No construction within the last three years that would require that*****			X	
144.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred *****Notes – No activity in area.*****			X	
145.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected *****Notes – No natural forces threats*****			X	
146.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions *****Notes – None*****			X	
147.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. *****Notes – None since 2003 when the farmer damaged the line*****	X			
148.	480-93-188(5)	Gas survey records: Retention/Content *****Notes – Maintained as long as the pipeline is in service per SP707*****	X			
149.	480-93-188(6)	Leak Survey Program/Self Audits *****Notes – Done in 12/16/2011. To be done this year.*****	X			
150.	192.709	Patrolling (Refer to Table Below) .705	X			

Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	2/yr (7½ months)	1/yr (15 months)
3	4/yr (4½ months)	2/yr (7½ months)
4	4/yr (4½ months)	4/yr (4½ months)

151.	192.709	Leak Surveys (Refer to Table Below) .706 *****Notes – This question is only for unodorized gas.*****			X	
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Class Location	Required	Not Exceed
1 and 2	1/yr	15 months
3	2/yr	7½ months
4	4/yr	4½ months

152.	192.605(b)	Abandoned Pipelines; Underwater Facility Reports .727(g)			X	
153.	192.709	Compressor Station Relief Devices – Inspection and Testing (1 per yr/15 months) .731(a)			X	
154.	192.709	Compressor Station Emergency Shutdown (1 per yr/15 months) .731(c)			X	
155.	192.709	Compressor Stations – Detection and Alarms (Performance Test) .736(c)			X	
156.	192.709	Pressure Limiting and Regulating Stations – Inspection and Testing intervals (1 per yr/15 months) .739 *****Notes – They provided the Williams records for the last three years. 4/2011*****	X			

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157.	192.709	Pressure Limiting and Regulator Stations – <u>Capacity Testing or Review (1 per yr/15 months)</u> .743 <b>****Notes – They provided the Williams records for the last three years. 4/2011****</b>	X			
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**Comments:**  
 \*\*\*\*Notes - #152-155 –None of these types of facilities. \*\*\*\*

158.	192.709	Do records indicate proper inspection and partial operation of transmission line <u>valves</u> that may be required during an emergency as required and prompt remedial actions taken if necessary? <b>(1 per yr/15 months)</b> .745	X			
159.	192.709	Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment? <b>(1 per yr/15 months)</b> .749 <b>****Notes - None****</b>			X	
160.	192.603(b)	Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion? .751 <b>****Notes – No occurrences/hot work****</b>			X	
161.	192.603(b)	Welding – Procedures .225(b) <b>****Notes – No construction since 2000 ****</b>			X	
162.	192.603(b)	Welding – Welder Qualification .227/.229 <b>****Notes – #57-78 No construction since 2000 ****</b>			X	
163.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) <b>****Notes – #57-78 No construction since 2000 ****</b>			X	
164.	192.709	NDT Records ( <b>Pipeline Life</b> ) .243(f)	X			
165.	192.709	Repair: pipe ( <b>Pipeline Life</b> ); Other than pipe ( <b>5 years</b> )	X			
166.	.807(b)	Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (Including new construction activities - WAC 480-93-013)	X			
167.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area’s (HCA’s) <b>****Notes - It is classified and designed Class 3****</b>	X			

**Comments:**

<b>CORROSION CONTROL RECORDS</b>			S	U	N/A	N/C
168.	192.453	CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel. <b>*****Notes – All CP Techs are level 1*****</b>	X			
169.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) <b>****Notes – It went online in 1956 when the pipeline was placed into service. One of the earliest examples of CP on a gas pipeline.****</b>	X			
170.	192.491(c)	Do records document that each buried or submerged pipeline that <b>has been converted to gas service and was installed after July 31, 1971</b> , has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? <b>****Notes – It was protected before 1971 ****</b>	X			

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<b>CORROSION CONTROL RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
171.	192.491	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) .465(a) ****Notes – No short sections/isolated sections****			X	
172.	192.491	Do records indicate the location of all items listed in 192.491(a)? ****Notes - They have records for the life of the pipe.****	X			
173.	192.491	Examination of Buried Pipe when Exposed .459 *****Notes – On the pipe inspection report****	X			
174.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed. ****Notes – They did 2011 and I looked at the PSP reads for the IMP digs*****	X			
175.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) ***Notes – Checked the last three years****	X			
176.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) ****Notes - None****			X	
177.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) ****Notes - None****			X	
178.	192.491	Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion? (1 per 3 cal yr/39 months) .465(e) ****Notes - None – no areas that do not have CP or have active corrosion***			X	
179.	192.491	Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (Including Casings) .467	X			
180.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) ****Notes – This situation did not occur****			X	
181.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched) ****Notes – Checked the half cells and multi-meters 2011 - present***	X			
182.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
183.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods ****Notes – There are carrier pipe test leads***			X	
184.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days *****Notes – None noted in last three years records****			X	
185.	480-93-110(5)(c)	Casing shorts cleared when practical *****Notes – None noted in last three years records****			X	
186.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months *****Notes – None noted in last three years records****			X	
187.	192.491	Do records document that pipelines with cathodic protection have <u>electrical test leads installed</u> in accordance with requirements of Subpart I? (192.471; 192.469)	X			
188.	192.491	Do records document that the operator has minimized the detrimental effects of stray currents when found? .473 *****Notes – None noted****			X	
189.	192.491	Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion? .475(a) *****Notes – The gas quality is OK – not sour or corrosive gas.****			X	
190.	192.491	Internal corrosion; Internal surface inspection; Pipe replacement .475(b) *****Notes – No IC was noted during the 2000 replacement project.****			X	
191.	192.491	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems . (192.476(b); 192.476(c)) *****Notes – No new construction****			X	
192.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 *****Notes – None ****			X	
193.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481	X			
194.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions, Records adequate? .483/485 *****Notes – Replaced pipe in 2000, but the replacement is considered part of their HP distribution system.****	X			

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<b>Comments:</b>
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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
195.	192.161	Supports and anchors	X			
196.	192.179	Valves installed as required? (Proper spacing, Readily accessible, Properly supported, Protection from Tampering/Damage, Blowdown-Discharge/Capacity)	X			
197.	480-93-015(1)	Odorization levels	X			
198.	192.463(a)	Levels of Cathodic Protection	X			
199.	192.465(b)	Rectifiers	X			
200.	192.467	CP - Electrical Isolation (192.467(a), (b), (c))	X			
201.	192.469	Test Stations (Sufficient Number)	X			
202.	192.476	Systems designed to reduce internal corrosion	X			
203.	192.479	Pipeline Components Exposed to the Atmosphere (192.479(a), (b), (c))				
204.	192.481	Atmospheric Corrosion – monitoring (192.481(b), (c))***Notes – There are two concrete supports at either side of the Lacamas Lake bridge that support the P04 Camas transmission line. The annual bridge-line inspection form has items for both atmospheric corrosion and the pipe coating condition. The company procedure referenced in SPW 480 3.2.2 indicates that during the atmospheric inspection, particular attention shall be given to pipe supports, but I did not see any documentation that demonstrates that the line pipe under the supports are being evaluated for corrosion on the bridge-line inspection form. ****	■	X	■	■
205.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992) ***Notes – None***			X	
206.	192.605	Knowledge of Operating Personnel	X			
207.	192.613; .703	Pipeline condition, unsatisfactory conditions, hazards, etc. captured and addressed? (192.613(a), (b); 192.703(a), (b), (c))	X			
208.	480-93-124	Pipeline Markers: Placed and maintained at above/below ground facilities. Road and railroad crossings (192.707(a))	X			
209.	192.719	Pre-pressure Tested Pipe (Markings and Inventory) (192.719(a), (b)) ***Notes – None***			X	
210.	192.739	Pressure Limiting and Regulating Devices (Mechanical) (spot-check field installed equipment vs. inspection records) (192.739(a), (b); 192.743) ***Notes – None. We will need to schedule Williams to be present for the next inspection to perform lock-up and/or relief. It was unknown until the field inspection that NWN does not perform pressure regulation functions of their line.***			X	
211.	192.743	Pressure Limiting and Regulating Devices (Capacities) (spot-check field installed equipment vs. inspection records) .***Notes - I reviewed the annual capacity review records Williams provided to NWN.****	X			
212.	192.745	Valve Maintenance: Field Inspection and partial operation (192.745(a), (b))	X			
213.	192.751	Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition. 192.7(a), (b), (c))	X			
214.	192.801 - 192.809	Operator qualification questions – Refer to OQ Field Inspection Protocol Form	X			

<b>Operator Qualification Field Validation</b>
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**Important:** Per PHMSA, the OQ Field Inspection Protocol Form 15 (Rev 6-2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at <http://primis.phmsa.dot.gov/oqdb/home.oq> **Date Form Completed/Uploaded?:** Will need to have assistance uploading. I do not have a login.

**Comments:**

<b>COMPRESSOR STATIONS INSPECTION</b>		S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)					
<b>If not located on a platform check here and skip 192.167(c)</b>					
192.163 (c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			X	
	Door latch must open from inside without a key			X	
(d)	Doors must swing outward			X	
	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X	
	Each gate located within 200 ft of any compressor plant building must open outward			X	
(e)	When occupied, the door must be opened from the inside without a key			X	
	Does the equipment and wiring within compressor stations conform to the <b>National Electric Code, ANSI/NFPA 70?</b>			X	
.165(a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	
.165(b)	Do the liquid separators have a manual means of removing liquids?			X	
	If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			X	
.167(a)	ESD system must:				
	- Discharge blowdown gas to a safe location			X	
	- Block and blowdown the gas in the station			X	
	- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
	- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
	ESD system must be operable from at least two locations, each of which is:				
.167 (b)	- Outside the gas area of the station			X	
	- Not more than 500 feet from the limits of the station			X	
	- ESD switches near emergency exits?			X	
.167(c)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			X	
.167(c)	Are ESDs on platforms designed to actuate automatically by...				
	- For unattended compressor stations, when:				
	▪ The gas pressure equals MAOP plus 15%?			X	
	▪ An uncontrolled fire occurs on the platform?			X	
	- For compressor station in a building, when:				
	▪ An uncontrolled fire occurs in the building?			X	
	▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to <b>NEC Class 1, Group D</b> is not a source of ignition)?			X	

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<b>COMPRESSOR STATIONS INSPECTION</b>		S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”) If not located on a platform check here and skip 192.167(c)					
.171(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			X	
(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
.173	Is each compressor station building adequately ventilated?			X	
.457	Is all buried piping cathodically protected?			X	
.481	Atmospheric corrosion control of aboveground facilities 192.481(b), (c); 192.479(a), (b), (c)			X	
.605	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units? 192.605(b)(5)			X	
	Are facility maps current/up-to-date? 192.605(b)(3)			X	
.616	Public Awareness Program effectiveness - Visit identified stakeholders as part of field inspection routine			X	
.605; .615(b)	Emergency Plan for the station on site?			X	
.707	Markers			X	
.199/.731	Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (192.199, 192.731(a), (b), (c))			X	
.735(a), (b)	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
	Are aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			X	
.736(a), (b)	Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?			X	

**Comments:**

\*\*\*Notes – 192.163(c) – 192.736(b) No compressors\*\*\*\*\*

**Alternative Maximum Allowable Operating Pressure**

For additional guidance refer to <http://primis.phmsa.dot.gov/maop/faqs.htm>  
For Additional guidance see the FAQs at <http://primis.phmsa.dot.gov/maop/faqs.htm>

192.620	<b>Alternative MAOP Procedures and Verifications</b>		S	U	N/A	N/C
	The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with:					
	Class Location	Alternative Design Factor (F)				
	1	0.80				
	2	0.67				
	3	0.56				
.620(a)	(1)	Establish alternative MAOP commensurate with class location – no class 4			X	
	(2)	MAOP cannot exceed the lowest of the following:				

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	<b>Alternative MAOP Procedures and Verifications</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
192.620	The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with:  <div style="display: flex; justify-content: space-around; margin-left: 40px;"> <div style="text-align: center;">Class Location</div> <div style="text-align: center;">Alternative Design Factor (F)</div> </div> <div style="display: flex; justify-content: space-around; margin-left: 40px;"> <div style="text-align: center;">1</div> <div style="text-align: center;">0.80</div> </div> <div style="display: flex; justify-content: space-around; margin-left: 40px;"> <div style="text-align: center;">2</div> <div style="text-align: center;">0.67</div> </div> <div style="display: flex; justify-content: space-around; margin-left: 40px;"> <div style="text-align: center;">3</div> <div style="text-align: center;">0.56</div> </div>				
	(i) Design pressure of the weakest element			X	
	(ii) Test pressure divided by applicable factor			X	
.620(b)	(2) Pipeline constructed of steel pipe meeting additional requirements in §192.112.			X	
	(3) SCADA system with remote monitoring and control			X	
	(4) Additional construction requirements described in §192.328			X	
	(5) No mechanical couplings			X	
	(6) No failures indicative of systemic material fault – if previously operated at lower MAOP			X	
	(7) 95% of girth welds have NDT			X	
	.620(c)	(1) PHMSA notified 180 days before operating at alternative MAOP			X
(2) Senior Executive signatures and copy to PHMSA				X	
(4) Strength test per §192.505 or certify previous strength test				X	
(6) Construction tasks treated as covered tasks for Operator Qualification				X	
(7) Records maintained for life of system				X	
(8) Class location change anomaly remediations				X	
620(d)	(1) Threat matrix developed consistent with §192.917			X	
	(2) Recalculate the potential impact circle per §192.903 and implement public education per §192.616			X	
	(3) Responding to an emergency in an HCA				
	(i) Identify HCAs using larger impact circle			X	
	(ii) Check personnel response times			X	
	(iii) Verify remote valve abilities			X	
	(iv) Verify line break valve control system			X	
	(4) Protect the right-of-way:				
	(i) ROW patrols 12 per year not to exceed 45 days			X	
	(ii) Plan to identify and mitigate unstable soil			X	
	(iii) Replace loss of cover if needed			X	
	(iv) Use line-of-sight markers per §192.707			X	
	(v) Review damage prevention program in light of national consensus practices			X	
	(vi) ROW management plan to protect against excavation activities			X	
	(5) Control Internal Corrosion:				
	(i) Program to monitor gas constituents			X	
	(ii) Filter separators if needed			X	
(iii) Gas Monitoring equipment used			X		
(iv) Cleaning pigs, inhibitors, and sample accumulated liquids					
.620(d)	(v) Limit CO2, H2S, and water in the gas stream			X	
	(vi) Quarterly program review based on monitoring results			X	
	(6) (i) Control interference that can impact external corrosion			X	

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192.620	<b>Alternative MAOP Procedures and Verifications</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>								
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Class Location	Alternative Design Factor (F)												
1	0.80												
2	0.67												
3	0.56												
	(ii) Survey to address interference currents and remedial actions			X									
(7)	Confirm external corrosion control through indirect assessment			X									
	(i) Assess adequacy of CIS and perform DCVG or ACVG within 6 months												
	(ii) Remediate damage with IR drop > 35%			X									
	(iii) Integrate internal inspection results with indirect assessment			X									
	(iv) Periodic assessments for HCAs			X									
	(A-C) Close interval surveys, test stations at ½ mile intervals, and integrate results												
(8)	Cathodic Protection			X									
	(i) Complete remediations within 6 months of failed reading												
	(ii) Confirm restoration by a close interval survey			X									
	(iii) Cathodic protection system operational within 12 months of construction completion			X									
(9)	Baseline assessment of integrity			X									
	(i)(A) Geometry tool run within 6 months of service												
	(i)(B) High resolution MFL tool run within 3 years of service			X									
	(ii) Geometry and MFL tool 2 years prior to raising pressure for existing lines			X									
	(iii) If short portions cannot accommodate tools, use direct assessment per §192.925, 927, 929 or pressure testing			X									
(10)	Periodic integrity assessments			X									
	(i) Frequency for assessments determined as if all segments covered by Subpart O												
	(ii) Inspect using MFL tool or direct assessment per §192.925, 927, 929 or pressure testing.			X									
(11)	Repairs			X									
	(i)(A) Use of the most conservative calculation for anomaly remaining strength												
	(B) Tool tolerances taken into consideration			X									
	(ii) Immediate repairs for:			X									
	(A) Dents meeting 309(b) criteria												
	(B) Defects meeting immediate criteria in §192.933(d)			X									
	(C) Calculated failure pressure ratio less than 1.25 for .67 design factor			X									
	(D) Calculated failure pressure ratio less than 1.4 for .56 design factor			X									
	(iii) Repairs within 1 year for:			X									
	(A) Defects meeting 1 year criteria in 933(d)												
	(B) Calculated failure pressure ratio less than 1.25 for .80 design factor			X									
	(C) Calculated failure pressure ratio less than 1.50 for .67 design factor			X									
	(D) Calculated failure pressure ratio less than 1.80 for .56 design factor			X									
	(iv) Evaluate defect growth rate for anomalies with > 1 year repair interval and set repair interval			X									
(1)	Provide overpressure protection to a max of 104% MAOP			X									

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	<b>Alternative MAOP Procedures and Verifications</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>								
192.620	<p>The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with:</p> <table style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;">Class Location</td> <td style="text-align: center;">Alternative Design Factor (F)</td> </tr> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">0.80</td> </tr> <tr> <td style="text-align: center;">2</td> <td style="text-align: center;">0.67</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">0.56</td> </tr> </table>	Class Location	Alternative Design Factor (F)	1	0.80	2	0.67	3	0.56				
Class Location	Alternative Design Factor (F)												
1	0.80												
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.620(e)	Does the AMAOP process include overpressure protection requirements?			X									
	Do records indicate that overpressure protection requirements were met?			X									

**Comments:**  
 \*\*\*Notes - 192.620-.620(e) No alternative MAOP\*\*\*\*

\*\*\*Notes – Done Annually\*\*\***Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)**

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<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-2012-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-2012-09	Oct 11, 12	Communication During Emergency Situations
ADB-2012-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB-12-07	Jun 11, 12	Mechanical Fitting Failure Reports
ADB-12-06	May 7, 12	Verification of Records establishing MAOP and MOP
ADB-12-05	Mar 23, 12	Cast Iron Pipe (Supplementary Advisory Bulletin)
ADB -12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB-12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation
ADB-11-05	Sep 1, 11	Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes
ADB-11-04	Jul 27, 11	Potential for damage to pipeline facilities caused by severe flooding.

For more PHMSA Advisory Bulletins, go to <http://phmsa.dot.gov/pipeline/regs/advisory-bulletin>

**Comments:**